

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO.</b> _____
	:	
<b>v.</b>	:	<b>DATE FILED:</b> _____
	:	
<b>DAVID WILLIAMS,</b>	:	<b>VIOLATIONS:</b>
<b>a/k/a "Jim,"</b>	:	
<b>a/k/a "David Bondosingh,"</b>	:	<b>21 U.S.C. § 846 (conspiracy to distribute</b>
<b>a/k/a "Federico Randes,"</b>	:	<b>phencyclidine ("PCP") - 1 count)</b>
<b>TONY CARTAGENA</b>	:	<b>21 U.S.C. § 841(a)(1) (possession with</b>
	:	<b>intent to distribute phencyclidine</b>
	:	<b>("PCP") - 1 count)</b>
	:	<b>21 U.S.C. § 841(a)(1) (attempted</b>
	:	<b>possession with intent to distribute</b>
	:	<b>phencyclidine ("PCP") - 1 count)</b>
	:	<b>21 U.S.C. § 843(b) (unlawful use</b>
	:	<b>of a communication facility - 1 count)</b>
	:	<b>Notice of forfeiture</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. From in or about November 2004 to on or about December 6, 2004, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**DAVID WILLIAMS,  
a/k/a "Jim,"  
a/k/a "David Bondosingh,"  
a/k/a "Federico Randes," and  
TONY CARTAGENA**

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute and possess with intent to distribute one kilogram or more,

that is, approximately 3.781 kilograms, of a mixture and substance containing a detectable amount of phencyclidine (“PCP”), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

**MANNER AND MEANS**

\_\_\_\_\_ It was a part of the conspiracy that:

2. Defendant **DAVID WILLIAMS** obtained multi-kilogram quantities of PCP in liquid form in California and arranged for the shipment of the PCP from Los Angeles, California to defendant **TONY CARTAGENA** in Philadelphia.

3. Defendant **TONY CARTAGENA** introduced defendant **DAVID WILLIAMS** to Person #1 known to the grand jury, an employee at Pennsport, a business located at 325 Bainbrige Street in Philadelphia, Pennsylvania, in order to gain Person #1's agreement to allow Person #1's name, or a facsimile thereof, to be used by defendants **CARTAGENA** and **DAVID WILLIAMS** as the addressee on packages containing PCP to be mailed by express mail from Los Angeles, California, to Pennsport, 325 Bainbridge Street in Philadelphia.

4. Defendant **DAVID WILLIAMS** caused one or more packages containing PCP to be mailed from Los Angeles to an addressee bearing a facsimile of Person #1's name, at Pennsport, for distribution and sale.

5. Defendant **TONY CARTAGENA** received and attempted to receive multiple packages in which quantities of PCP in liquid form were concealed, which had been mailed by defendant **DAVID WILLIAMS** from Los Angeles, California to Pennsport in Philadelphia.

**OVERT ACTS**

In furtherance of the conspiracy and to accomplish its object, the defendants committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

1. On or about November 12, 2004, defendant **DAVID WILLIAMS** and Person #1 traveled from Philadelphia to Los Angeles, to arrange for the delivery of PCP to Philadelphia.
2. On or about November 15, 2004, defendant **TONY CARTAGENA** asked Person #1 if he (**CARTAGENA**) could use Person #1's name at the front desk of the Pennsport gym, located at 325 Bainbridge Street, in Philadelphia, in order to receive mail.
3. On or about November 17, 2004, defendants **DAVID WILLIAMS** and **TONY CARTAGENA** caused two express mail parcels addressed to "Robert Gibson" to be delivered to the Pennsport gym.
4. In or about early December 2004, defendant **TONY CARTAGENA** again asked Person #1 for permission to use his name in order to receive mail at the Pennsport gym.
5. On or about December 3, 2004, defendant **DAVID WILLIAMS** mailed an express mail parcel addressed to "Rob Gibbs," 325 Bainbridge, Pennsport, Philadelphia, Pennsylvania to the Pennsport gym, 325 Bainbridge Street, Philadelphia, Pennsylvania, which parcel contained approximately 3.781 kilograms of PCP in liquid form.

All in violation of Title 21, United States Code, Section 846.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

From on or about December 2, 2004, to on or about December 4, 2004, in the Eastern District of Pennsylvania, and elsewhere, defendant

**DAVID WILLIAMS,  
a/k/a “Jim,”  
a/k/a “David Bondosingh,”  
a/k/a “Federico Randes,”**

knowingly and intentionally possessed with intent to distribute one kilogram or more, that is, approximately 3,721 grams, of a mixture and substance containing a detectable amount of phencyclidine (“PCP”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

From on or about December 2, 2004, to on or about December 4, 2004, in the Eastern District of Pennsylvania, and elsewhere, defendant

**TONY CARTAGENA**

knowingly and intentionally attempted to possess with intent to distribute 1 kilogram or more, that is, approximately 3,721 grams, of a mixture and substance containing a detectable amount of phencyclidine (“PCP”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, and 841(a)(1), (b)(1)(A).

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

From on or about December 2, 2004, to on or about December 4, 2004, in the Eastern District of Pennsylvania, and elsewhere, defendant

**DAVID WILLIAMS,  
a/k/a “Jim,”  
a/k/a “David Bondosingh,”  
a/k/a “Federico Randes,”**

knowingly and intentionally used a communication facility, that is, the United States mail, in committing and in causing and facilitating a felony, that is, the conspiracy to possess with intent to distribute one kilogram or more, that is, approximately 3,721 grams, of a mixture and substance containing a detectable amount of phencyclidine (“PCP”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 843(b).

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 21, United States Code, Sections 841(a)(1) and 846, set forth in this indictment, defendants

**DAVID WILLIAMS,  
a/k/a “Jim,”  
a/k/a “David Bondosingh,”  
a/k/a “Federico Randes,” and  
TONY CARTAGENA**

shall forfeit to the United States of America:

(a) Any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violations, as charged in this indictment;

(b) Any property constituting, or derived from, any proceeds obtained directly or indirectly as a result of such violations.

2. If any of the property described above as being subject to forfeiture, as a result of any act of omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with a third person;

(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to

seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All pursuant to Title 21, United States Code, Section 853.

**A TRUE BILL:**

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**FOREPERSON**

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**PATRICK L. MEEHAN**  
**United States Attorney**